

# **EXHIBIT A**



Morgan & Morgan is a leading civil trial law firm representing consumers and commercial clients nationwide. With over 1,000 lawyers, and more than 3,000 non-lawyer employees, Morgan & Morgan is the largest plaintiffs' firm in the nation. Morgan & Morgan maintains over offices throughout the United States. Among its lawyers are former state attorney generals and present and former members of various state legislatures.

Morgan & Morgan has a dedicated Complex Litigation Group staffed with lawyers, paralegals, and retired FBI agents serving as investigators committed to representing consumers in complex litigation, MDL proceedings and class action cases throughout the country. It has achieved many remarkable results in class litigation, including the settlement of *In re Black Farmers Discrimination Litigation*, no. 08-0511 (D.C. Oct. 27, 2017), where one of its partners served as co-lead. The case resulted in a settlement with the United States Government in the amount of \$1.2 billion for African American farmers who had been systematically discriminated against on the basis of race, in violation of the Fifth Amendment to the United States Constitution, the Equal Credit Opportunity Act, Title VI of the Civil Rights Act, and the Administrative Procedure Act. The Class Action section is a part of Morgan & Morgan's Complex Litigation group, has assembled a talented, ethnically diverse team of lawyers. Aside from the lawyers listed below, its team of lawyers is assisted by 75 lawyers in the shared legal services section of the Complex Litigation Group. These lawyers are dedicated to document review, deposition preparations and deposition summaries. It is also assisted by a separate section of 8 lawyers, comprised of former federal law clerks at the District and Circuit level, who assist the Class Action section with research and writing support.

**John A. Yanchunis** leads the class action section of the law firm. His practice—which began after completing a two-year clerkship with United States District Judge Carl O. Bue, Jr., S. D. Tex.—has concentrated on complex litigation and spans over 43 years, including consumer class actions for more than two-thirds of that time. As a result of his extensive experience in class litigation, including privacy and data-breach litigation, he regularly lectures nationally and internationally at seminars and symposiums regarding class litigation and privacy litigation. He is a member of The State Bar of Texas and The Florida Bar.

He has served as lead, co-lead, and class counsel in numerous national class actions, including multi-district litigation, involving a wide range of subjects affecting consumers, including antitrust, defective products, life insurance, annuities, and deceptive and unfair acts and practices. In 2014, he was recognized by the National Law Journal as a trailblazer in the area of privacy litigation, and in 2019, 2020 and 2023, he was recognized by LAW 360 as one of a very small number of MVPs in the United States in the area of privacy and cyber security litigation. For his work in the area of privacy litigation, he was awarded lawyer of the year in the state of Florida by The Daily Business Review. In 2023, he was also recognized by LAW 360 as a Titan of the Plaintiffs' Bar.

As a result of his experience in insurance and complex litigation, beginning in 2005, he was selected by Tom Gallagher, the Chief Financial Officer for the state of Florida and a member of the Florida Cabinet, to serve as lead counsel for the Florida Department of Financial Services and the Florida Department of Insurance Regulation (the insurance regulators of Florida) in their investigations of the insurance industry on issues concerning possible antitrust activity and other possible unlawful activities regarding the payment of undisclosed compensation to insurance brokers. He served as lead regulator counsel and worked with a core group of state Attorneys General from the National Association of Attorneys General, which were selected to conduct the investigations. The insurance regulator for Florida was the only insurance regulator in the group. The litigation that was filed and the related investigations netted millions of dollars in restitution for Florida consumers and resulted in significant changes in the way commercial insurance is sold in Florida and across the country.

During his career, he has tried numerous cases in state and federal courts, including one of the largest and longest insurance coverage cases in U.S. history, which was filed in 1991 by the Celotex Corporation and its subsidiary, Carey Canada, Inc. During the seventeen years the case pended, he served as lead counsel for several insurance companies, regarding coverage for asbestos and environmental claims. The case was tried in three phases over several years beginning in 1992. He was also lead counsel for these parties in the subsequent appeals that followed a judgment in favor of his clients.

Mr. Yanchunis began his work in privacy litigation in 1999 with the filing of *In re Doubleclick Inc. Privacy Litigation*, 154 F. Supp. 2d 497 (S.D.N.Y. 2001), alleging privacy violations based on the placement of cookies on hard drives of internet users. Beginning in 2003, he served as co-Lead Counsel in the successful prosecution and settlement of privacy class action cases involving the protection of privacy rights of more than 200 million consumers under the Driver's Protection Privacy Act (DPPA) against the world's largest data and information brokers, including Experian, R.L. Polk, Acxiom, and Reed Elsevier (which owns Lexis/Nexis). See *Fresco v. Automotive Directions, Inc.*, No. 03-61063-JEM (S.D. Fla.), and *Fresco v. R.L. Polk*, No. 07-

cv-60695-JEM (S.D. Fla.). Subsequently, I also served as co-Lead Counsel in the DPPA class cases, *Davis v. Bank of America*, No. 05-cv-80806 (S.D. Fla.) (\$10 million class settlement), and *Kehoe v. Fidelity Fed. Bank and Trust*, No. 03-cv-80593 (S.D. Fla.) (\$50 million class settlement).

He has been appointed and served in leadership positions a number of multidistrict litigation in the area of privacy and data breaches: *In re: Capital One Consumer Data Security Breach Litigation*, No. 1:19-MD-2915-AJT (E.D. Va.) (settlement for \$190,000,000 preliminarily approved ) *In re Yahoo! Inc. Customer Data Security Breach Litigation*, No. 5:16-MD-02752-LHK (N.D. Cal.) (“Yahoo”) (Lead Counsel) (Court approved \$117,500,000.00 common fund settlement for approximately 194 million US residents and 270,000 Israeli citizens ); *In re The Home Depot, Inc. Consumer Data Sec. Data Breach Litig.*, No. 1:14-md-02583-TWT (N.D. Ga.) (co-Lead Counsel) (final judgment entered approving a settlement on behalf of a class of 40 million consumers with total value of \$29,025,000); *In Re: Equifax, Inc. Customer Data Security Breach Litigation*, 1:17-md-2800-TWT (N.D. Ga.) (member of the Plaintiffs’ Steering Committee) (final judgment entered approving \$380.5 million fund for 145 million consumers ); *In re: U.S. Office of Personnel Management Data Security Breach Litigation*, 1:15-mc-01394-ABJ (D.D.C.) (“OPM”) (member of the Executive Committee) (motion for preliminary approval of a \$60,000,000 common fund ); *In re Target Corp. Customer Data Sec. Breach Litig.*, MDL No. 2522 (D. Minn.) (Executive Committee member) (final judgment approving a settlement on behalf of a class of approximately 100 million consumers ).

His court-appointed leadership experience in non-MDL, data breach class actions extends to dozens of cases which he has litigated and settled, and includes one of the few contested certifications in a data breach case : *Schmidt, et al., v. Facebook, Inc.*, No. 3:18-cv-05982 (N.D. Cal.) (Co-Lead Counsel) (“Facebook”) (class certified for 8 million residents , subsequently settlement of the class was approved by the court), and a contested certification in *Brown, et al., v. Google, LLC*, 4:20-cv-03664-YGR (N.D. Cal.). The case against Google is set for trial at the end of January 2024.

His experience in these major data breach matters extends far beyond simply briefing threshold issues and negotiating settlements. Rather, he has personally deposed dozens of corporate representatives, software engineers, cyber professionals and CISOs in major data breach cases such as Capital One, Yahoo, Kimpton, and Facebook. In addition, he has defended experts used in these cases and also deposed defense liability and damage experts.

Presently he leads his firm’s efforts in two major class cases pending against Google for data misuse.

As result of his experience in the area of class litigation and ethics, he has served as an expert for The Florida Bar on ethical issues arising in class action litigation. He was also appointed by The Florida Supreme Court to enforce one of its orders for indirect criminal contempt, which led to the incarceration of the respondent.

He is a frequent lecturer on privacy and class litigation nationally and internationally, including at international conferences, having presented at the University of Haifa's 2019 Class Action Conference, in Haifa, Israel, attended by lawyers, judges and law professors from around the world. In he lectured on data privacy in Mexico, the United Kingdom and the Netherlands.

He has served in a number of leadership positions in The Florida Bar, having been elected to two terms in The Young Lawyers Division of The Florida Bar, to two terms to The Board of Governors of The Florida Bar, and he was appointed by The Florida Supreme Court to serve a 5 year term as a Member of The Florida Board of Bar Examiners , and today he continues to serve as an emeritus member . He has been a member of numerous committees of The Florida Bar , and been appointed chair of many of them . He

While at the University of Florida Mr. Yanchunis was a member of Florida Blue Key and Omicron Delta Kappa. He received his Juris Doctor degree from the South Texas College of Law in 1980, where he graduated magna cum laude. During law school, Mr. Yanchunis was a member of the Order of the Lytae, Associate Editor-in-Chief and Technical Editor of the South Texas Law Journal.

**Michael F. Ram.** Mr. Ram is a consumer class action lawyer with 40 years of experience. He graduated cum laude from Harvard Law School in 1982. He has co-tried several class action trials and frequently lectures on class trials. In 1992 he was a co-recipient of the Trial Lawyer of the Year Award given by Trial Lawyers for Public Justice for *National Association of Radiation Survivors v. Walters* No. 83-c-1861 (N.D. Cal.) (tried to class-wide judgment on remand from Supreme Court).

From 1993 through 1997, Mr. Ram was a partner with Lieff, Cabraser, Heimann and Bernstein where he represented plaintiffs in several major class actions, including: *Cox v. Shell*, Civ. No 18,844 (Obion County Chancery Court, Tenn.) national class of six million owners of property with defective polybutylene plumbing systems; *In re Louisiana-Pacific Inner-Seal Litigation*, No. 95-cv-879 (D. Oregon) (co-lead counsel) national class of homeowners with defective siding; *ABS Pipe Litigation*, Cal. Judicial Council Coordination Proceeding No. 3126 (Contra Costa County) national class of homeowners.

In 1997, Mr. Ram founded Levy, Ram & Olson which became Ram & Olson and then Ram,

Olson, Cereghino & Kopczynski. He was co-lead counsel in many consumer class actions including a national class of half a million owners of dangerous glass pane gas fireplaces in *Keilholtz et al. v. Superior Fireplace Company*, No. 08-cv-00836 (N.D. Cal. 2008). He was co-lead counsel for plaintiffs in *Chamberlan v. Ford Motor Company*, No. 03-cv-2628 (N.D. Cal.), a class action involving defective intake manifolds that generated four published opinions, including one by the Ninth Circuit, 402 F.3d at 950, and settled one court day before the class trial. He was also co-counsel for plaintiffs in a number of other consumer class actions, including: *In re General Motors Corp. Product Liability Lit.* MDL No. 1896 (W.D. Wash.) (defective speedometers); *Richison v. American Cemwood Corp.*, San Joaquin Superior Court Case No. 005532 (defective Cemwood Shakes); *Williams v. Weyerhaeuser*, San Francisco Superior Court Case No. 995787 (defective hardboard siding); *Naef v. Masonite*, Mobile County, Alabama Circuit Court Case No. CV-94-4033 (defective hardboard siding on their homes); *Hanlon v. Chrysler Corp.*, 150 F.3d 1011 (9th Cir. 1998) (approving class action settlement); *McAdams v. Monier, Inc.* (2010) 182 Cal. App. 4th 174 (reversing denial of class certification in consumer class action involving roof tiles); *Gardner v. Stimson Lumber Co.* (King County Wash. No. 2-17633-3-SEA) (defective siding); *Rosenberg v. U-Haul* (Santa Cruz Superior Ct. No. CV-144045 (certified consumer class action for false and deceptive conduct; tried successfully to judgment); *In re Google Buzz User Privacy Litigation*, No. 10-cv-00672-JW (N.D. Cal. 2011) (international class action settlement for false and deceptive conduct); *Whitaker v. Health Net of California, Inc., and International Business Machines Corp.*, No. 2:11-cv-0910 KJM DAD (E.D. Cal.) (electronic privacy class action under the California Confidentiality of Medical Information Act); and *In re Kitec Plumbing System Products Liab. Litigation MDL No 2098*, N.D. Texas, No. 09-MD-2098 (MDL class action involving claims concerning defective plumbing systems).

From 2017 to 2020, Mr. Ram was a partner at Robins Kaplan LLP. In August, 2020, Mr. Ram joined Morgan & Morgan to open a San Francisco office for them. He is currently co-lead counsel in numerous consumer class actions, including *Gold v. Lumber Liquidators*, N.D. Cal. No. 14-cv-05373-RS, a certified multistate class action involving bamboo floors, and *Fowler v. Wells Fargo*, N.D. Cal. No. 3:17-cv-02092-HSG, a class action involving interest charges that settled for \$30 million. He is currently serving on the Plaintiffs' Steering Committee *In re Philips Recalled CPAP, Bi-Level Pap, And Mechanical Ventilator Products Litigation*, MDL No. 3014, where he is co-chair of the Law and Briefing Committee. In addition, Mr. Ram is also currently serving on the Plaintiffs' Expert Discovery Committee *In re Kia Hyundai Vehicle Theft Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 3052.

**Jean Sutton Martin** is one of the lead attorneys in the Class Action Department of Morgan & Morgan, devoting her practice to data privacy, consumer protection, and defective products class actions. In addition to consumer class actions, Ms. Martin has practiced in the areas of mass tort and catastrophic personal injury, starting mass torts practice groups at two plaintiffs' firms. Prior to joining Morgan and Morgan, Ms. Martin ran her own law firm in North Carolina concentrating



on consumer class actions and mass tort litigation.

Ms. Martin received her Juris Doctor degree from Wake Forest University School of Law, where she served as Editor-in-Chief of the *Wake Forest Law Review*. Ms. Martin graduated from Wake Forest University with a Bachelor of Science in Mathematical Economics and earned a Master of International Business from the University of South Carolina. She also has served as an adjunct professor at her alma mater, Wake Forest University School of Law. She obtained eDiscovery certification from the eDiscovery Training Academy at Georgetown Law Center in 2017.

Ms. Martin has been honored with the prestigious “AV” rating by Martindale-Hubbell. In 2016, Ms. Martin was selected by her peers as the foremost Litigation attorney in the State of North Carolina for *Business North Carolina Magazine’s Legal Elite*, gaining membership in the *Legal Elite* Hall of Fame. In 2022, she was recognized by Law360 as an MVP in the area of cybersecurity and data privacy. She was named as one of National Law Journal’s Class Action/Mass Tort Litigation Trailblazers of 2023.

Ms. Martin concentrates her practice on complex litigation, including consumer protection, data privacy, and defective products class action. Ms. Martin concentrates her practice on complex litigation, including consumer protection, data privacy, and defective products class action. She presently serves by appointment as interim co-lead counsel in *In re HCA Healthcare Data Security Litigation*, No. 3:23-cv-00684 (M.D. Tenn.), *Combs, et al. v. Warner Music Group*, Case No. 1:20-cv-07473-PGG (S.D.N.Y.) and *Johnson, et al. v. Yuma Regional Medical Center*, 2:22-cv-01061-SMB (D. Ariz.). She also serves as a member of the Plaintiffs’ Steering Committee for the cases proceeding against LabCorp, Inc. in *In re: American Medical Collection Agency Data Breach Litigation*, 19-md-2904 (D. N.J.) and a steering committee member *In re: Allergan Biocell Textured Breast Implant Products Liability Litigation*, No. 19-md-2921 (D. N.J.).

In a case in which she serves as interim co-lead counsel, Ms. Martin argued the motion for class certification which resulted in the first order in the country granting Rule 23(b)(3) certification in a consumer payment card data breach. She also argued the appeal of that decision. The Eleventh Circuit found standing for Ms. Martin’s client and embraced the presented damages model, remanding the case for further predominance inquiry given the District Court’s modification of the class definition. *In re Brinker Data Incident Litigation*, No. 3:18-cv-686-TJC-MCR, 2021 WL 1405508 (M.D. Fla. Apr. 14, 2021) *vacated in part sub nom. Green-Cooper v. Brinker International, Inc.*, 73 F.4th 883 (11 Cir. 2023).

She has served in leadership positions in many consumer class actions and consolidated proceedings in federal courts around the country, including *inter alia*: *In Re: Ambry Genetics Data Breach Litigation*, Case No. 8:20-cv-00791-CJC (C.D. Cal.), (settlement valued in excess of \$20 million for a class of approximately 230,000 patients); *Desue, et al. v. 20/20 Eye Care Network, Inc. et al.*, 21-cv-61275 (S.D. Fla.) (Chair of the Plaintiffs’ Executive Committee) (settlement on

behalf of more than 4 million class members, including minors); *In re Morgan Stanley Data Security Litigation*, 1:20-cv-05914 (S.D.N.Y.) (\$68 million settlement for 15 million class members); *Aguallo, et al. v. Kemper Corp., et al.*, Case No.: 1:21-cv-01883 (N.D. Ill.) (data breach settlement valued at over \$17.5 million) (co-lead counsel); *Gordon, et al. v. Chipotle Mexican Grill, Inc.*, No. 17-cv-01415 (D. Colo.) (data breach) (co-lead counsel); *Linnins v. HAECO Americas, Inc., et al.*, No. 16-cv-486 (M.D.N.C.) (employee data disclosure) (co-lead counsel); *Torres v. Wendy's International, LLC*, No. 6:16-cv-210 (M.D. Fla.) (data breach) (class counsel); *Fuentes, et al. v. UniRush, LLC, et al.*, No. 1:15-cv-08372 (S.D.N.Y.) (disruption in servicing of financial accounts) (co-lead counsel); *Lewis, et al., v. Green Dot Corp., et al.*, No. 2:16-cv-03557 (C.D. Cal.) (disruption in servicing of financial accounts) (class counsel); *Brady, et al. v. Due North Holdings, LLC, et al.*, No. 1:17-cv-01313 (S.D. Ind.) (employee data disclosure) (class counsel); *Foreman v. Solera Holdings, Inc.*, No. 6:17-cv-02002 (M.D. Fla.) (employee data disclosure) (class counsel); *In Re: Outer Banks Power Outage Litigation*, No. 4:17-cv-141 (E.D.N.C.) (extended island power outage due to defective construction practices) (class counsel); and, *McCoy v. North State Aviation, LLC, et al.*, No. 17-cv-346 (M.D.N.C.) (WARN Act violations) (class counsel).

Ms. Martin has been a presenter on a variety of topics related to class actions including: *Fantasy Gaming Webinar: FanDuel and DraftKings Litigation*, AAJ (December 2015); *Thinking Outside the Black Box: Drug Cases in the Class Context*, Mass Torts Made Perfect (October 2019); *Mass Torts and MDLs*, Western Alliance Class Action Forum (March 2020); *Consumer Class Actions*, Western Alliance Class Action Forum (March 2022); *How to Maximize Efficiency in Document Production and Review*, Mass Torts Made Perfect (April 2022); *Class Action Takeover: The Rise of Class Actions within MDLs*, HarrisMartin (July 2023).

Beyond her legal work, Ms. Martin organized the first Class of Our Own women's summit which was held in Nashville, Tennessee in May 2023. The invitation-only summit for female class action attorneys featured two days of legal panels while also promoting female empowerment. More than 100 women from multiple disciplines from across the country attended the event. Plans are underway for 2024 with the goal to make this summit an annual event.

Before entering law school, Ms. Martin worked with the sales finance team of Digital Equipment Company in Munich, Germany developing sales forecasts and pricing models for the company's expansion into the Eastern European market after the fall of the Berlin wall. She also worked as a practice management consultant for a physician consulting group and as a marketing manager for an international candy manufacturer where her responsibilities included product development, brand licensing, market research, and sales analysis.

Ms. Martin is a member of the North Carolina bar, having been admitted in 1998. She is also admitted to practice before the United States Supreme Court, the United States Court of Federal Claims, the United States Court of Appeals for the Fourth Circuit, the Western, Middle, and Eastern Districts of North Carolina, and the United States District Court of Colorado.



***Marie Noel Appel.*** Ms. Appel has dedicated her career to representing consumers, primarily in class action cases, involving claims under consumer protection laws and other statutory and common law claims.

For the first fifteen years of her career, Ms. Appel litigated class claims on behalf of consumers, including actively participating in the following cases: *Lussier v. The Lucas Dealership Group*, No. CGC-95-391224 (San Mateo Super. Ct.) (unfair business practices suit for automobile repair overcharges resulting in confidential settlement after three weeks of trial in 1998); *Pang v. Jani King of Calif., Inc.*, No. CGC-98-396258 (San Mateo Super. Ct.) (class action unfair business practice suit alleging improper franchise practices settled in 1999 on appeal); *Capers v. Pac. Bell Internet Serv.*, No. CGC-01-318733 (San Francisco Sup. Ct.) (unfair business practice suit for improper DSL billing practices resulting in refunds of more than \$1.6 million to 20,000 class members and distribution of more than \$40,000 to charitable organizations in 2004); *Clark v. Santa Barbara Bank & Trust*, No. CGC-04-427959 (San Francisco Super. Ct.) (unfair business practices for improper debt collection practices resulting in refunds of more than \$2 million and distribution of more than \$200,000 in cy pres relief in 2007); *Dubray v. City of Dublin*, No. 2002057128 (Alameda County Super. Ct.) (class action against the City of Dublin for illegal governmental cost collection practices); *Donovan v. RRL Corp.*, 26 Cal. 4th 261 (2001) (one of amicus counsel for National Association of Consumer Advocates regarding whether automobile price advertisement was a contract offer); *Buick v. World Sav. Bank*, No 2:07-CV-01447 (E.D. Cal.) (individual Truth in Lending action regarding home equity loan which settled in 2011); and *Briggs v United States*, No. CV-07-5760 WHA (N.D. Cal.) (statutory violations resulting in \$7.4 million settlement in 2009 on behalf of a nationwide class of veterans whose tax refunds and benefits the government withheld to recover time-barred debts to the Army & Air Force Exchange Service).

From 2012 to 2019, Ms. Appel left private practice to become the Supervising Attorney of the Consumer Project and the Medical-Legal Project at the Justice & Diversity Center of the Bar Association of San Francisco which provides free legal services to low-income persons. In that position, Ms. Appel trained and supervised volunteer attorneys assisting clients facing debt collection lawsuits, and provided a range of direct legal services to clients, primarily patients at low-income medical clinics, as well as collaborating with, and training, medical interns, residents, nurses, and staff regarding legal issues impacting patient health outcomes. Ms. Appel also presented on topics relating to providing pro bono services to consumers, including, *Disaster-Related Consumer Issues Including Consumer Protection Laws and Debtors' Rights and Responsibilities*, *Providing Legal Assistance in Aftermath of Disaster*, *Practising Law Institute* (September 2015); *Successful Pro Bono Based Projects to Assist Self-Represented Litigants: Partnering with Bar Associations, Small & Solo Practitioners, New Attorneys, Law Schools, and*

Courts, Self-Represented Litigation Network Conference (February 2017); Successful Pro-Bono Based Projects to Assist Self-Represented Litigants, Self-Represented Litigation Network Conference (February 2018), and Helping Clients Facing Collection Actions For Covid-19 Rental Debt, Tenants Together, Tenant Lawyer Network (January 2022).

In April 2019, Ms. Appel returned to private practice as Counsel at Robins Kaplan, LLP, then joined Morgan & Morgan in August 2020 where she again focuses on class action consumer litigation including the following litigations: *Gold v. Lumber Liquidators*, No. 14-cv-05373-RS (N.D. Cal.) (settlement approval and distribution of a certified multistate class action involving bamboo floors); *In Re: Philips Recalled CPAP, Bi-Level PAP, and Mechanical Ventilator Prod. Litig.*, MDL No. 3014 (Medical Monitoring Working Group); and *Weston v. Subaru of America, Inc.*, No. 1:20-cv-05876-CPO-SAK (D.N.J.) (informal Plaintiffs' Steering Committee).

In addition to her legal practice, Ms. Appel also has served as an Adjunct Professor at Golden Gate University School of Law in San Francisco where she has taught legal research and writing, and taught and supervised students at the Consumer Rights Clinic, in which students performed legal work at the Justice & Diversity Center's Consumer Debt Defense and Education Clinics.

Ms. Appel has a long history of pro bono involvement and currently is a regular volunteer at the Community Legal Assistance Saturday Program, a monthly free legal clinic sponsored by the Alameda County Bar Association. From 1997 to 2012, Ms. Appel provided pro bono representation for numerous low-income consumers facing debt collection lawsuits, and volunteered regularly at free legal clinics through the Justice & Diversity Center in San Francisco which, on multiple years, designated her as one of the Outstanding Volunteers in Public Service.

Ms. Appel earned a B.A. in French from San Francisco State University in 1992, and a Juris Doctor from University of San Francisco School of Law in 1996 where she was an Associate Literary Editor of the *USF Maritime Law Journal*.

Ms. Appel is admitted to the State Bar of California and to United States District Courts in the Central District of California, the Eastern District of California, the Northern District of California, the Southern District of California, the Northern District of Illinois, the Western District of Michigan, and the Ninth Circuit Court of Appeals.

***Kenya Reddy.*** Ms. Reddy represents consumers in class action litigation. She graduated from Duke University in 1997 with a degree in political science. In 2000, she received her law degree from the University of Virginia School of Law. Prior to joining Morgan & Morgan, Ms. Reddy was a shareholder at Carlton Fields, P.A., where her primary areas of practice were

antitrust, complex civil litigation, class action defense, and business litigation. She also has experience in including labor and employment, products litigation, ERISA and employee benefits law, insurance, healthcare, and securities litigation.

Ms. Reddy has served as a law clerk for the Honorable Charles R. Wilson, United States Circuit Court Judge, Court of Appeals for the Eleventh Circuit, the Honorable Anne C. Conway, former Chief Judge of the United States District Court for the Middle District of Florida, the Honorable Mary S. Scriven, United States District Judge, Middle District of Florida, and the Honorable Karla R. Spaulding, United States Magistrate Judge, Middle District of Florida.

Ms. Reddy was a guest speaker in January 2019 at HarrisMartin's Marriott Data Breach Litigation Conference on the topic of standing in data breach cases. In October 2019, she presented on the topic of third-party litigation funding at the Mass Torts Made Perfect Conference.

Ms. Reddy is admitted to practice in the Northern, Middle, and Southern Districts of Florida.

**Ryan J. McGee.** Mr. McGee joined Morgan & Morgan's Complex Litigation Group in March 2018, and has since extensively practiced in the areas of privacy and consumer protection class action litigation. His work since 2018 resulted in Law360 recognizing him as one of only three Rising Stars in the area of cybersecurity and privacy for 2023.

He has substantially supported the following representative litigations resulting in the recovery of more than half a billion dollars for consumers: *Rodriguez v. Google LLC*, No. 3:20-cv-04688-RS (N.D. Cal.); *Brown v. Google LLC*, No. 4:20-cv-03664-YGR (N.D. Cal.); *In re Morgan Stanley Data Security Litigation*, No. 20-cv-5914-AT (S.D.N.Y.); *Adkins v. Facebook, Inc.*, No. 3:18-cv-05982-WHA (N.D. Cal.); *In Re: Ambry Genetics Data Breach Litigation*, No. 20-cv-00791 (C.D. Cal.); *Pfeiffer et al. v. RadNet, Inc.*, No. 2:20-cv-09553-RGK (C.D. Cal.); *Ford et al. v. [24]7.ai, Inc.*, No. 5:18-cv-02770-BLF (N.D. Cal.); *In re Yahoo! Inc. Customer Data Security Breach Litigation*, No. 16-md-02752-LHK (N.D. Cal.); *In re Equifax, Inc. Customer Data Security Breach Litigation*, No. 1:17-md-02800 (N.D. Ga.); *In re: U.S. Office of Personnel Management Data Security Breach Litigation*, 1:15-mc-01394-ABJ (D.D.C.); *Henderson v. Kalispell Regional Healthcare*, No. CDV-19-0761 (Montana Eighth Judicial Court – Cascade County); *Morrow v. Quest*, No. 2:17-cv-0948 (CCC) (JBC) (D.N.J.); *In re Google Plus Profile Litigation*, No. 5:18-cv-06164 EJD (N.D. Cal.); *Stoll et al. v. Musculoskeletal Institute, Chartered d/b/a Florida Orthopaedic Institute*, No. 8:20-cv-01798-CEH (M.D. Fla.); and *Kuss v. American HomePatient, Inc., et al.*, No. 8:18-cv-02348 (M.D. Fla.).

His experience in privacy litigation extends well beyond drafting pleadings, briefing legal

disputes, and negotiating settlements. He has personally deposed dozens of corporate representatives, software engineers, and cyber professionals in major privacy cases such as *Brown v. Google*, *Capital One*, and *Facebook*. He has also deposed defense liability and damages experts in these (and other) cases, and defended experts in those fields at deposition and in *Daubert* hearings. Mr. McGee cross-examined two (of four) technical witnesses during the hearing that resulted in the successful pursuit of multiple sanctions against Google.

Ryan studied business economics and history at the University of Florida, where he was a teaching assistant for technology classes in the business school, and received his law degree from Stetson University College of Law, where he was an editor on the *Stetson Law Review*, a research assistant for antitrust and consumer protection laws, and a teaching assistant for Stetson's trial advocacy program. He began his legal career as a state-appointed prosecutor, where he tried over 50 jury trials to verdict, mostly felonies, as well as a special prosecutor appointed to investigate police officers' deadly use-of-force and corruption within various law enforcement agencies. Ryan also served as a law clerk for two years for the Honorable Elizabeth A. Kovachevich, the former Chief United States District Judge, Middle District of Florida. Before joining Morgan & Morgan, Ryan's practice involved complex business disputes, antitrust, trade secret, data security, and class action investigations and defense-side litigation in state and federal courts across the country.

Ryan was admitted to the Florida Bar in 2009 and is also admitted to practice in the Northern, Middle, and Southern Districts of Florida; the District of Colorado; and the Ninth Circuit Court of Appeals.

**Patrick Barthle.** Mr. Barthle is the second-longest tenured attorney in the Class Action Department of Morgan & Morgan. He was born and raised in Dade City, Florida. He attended the University of Florida where he was admitted to the Honors Program and graduated, *cum laude*, with a double major in History and Criminology in 2009. While at UF, Patrick was inducted into the Phi Beta Kappa Honor Society and served as President of the Catholic Student Center. Patrick attended Washington and Lee University School of Law, graduating *summa cum laude* in 2012; where he was a Lead Articles Editor for the Wash. & Lee Law Review, a member of the Order of the Coif and the Phi Delta Phi Legal Honor Society, and President of the W&L Law Families organization.

Before joining Morgan & Morgan in 2015, Patrick worked at one of the country's largest law firms, Greenberg Traurig, LLP, and then served as a judicial law clerk for two years to the Honorable Mary S. Scriven, United States District Judge, Middle District of Florida. Patrick has extensive privacy and consumer fraud class action experiencing, having actively participated in the following litigations: *In re: Capital One Consumer Data Security Breach Litigation*, No. 1:19-MD-2915-AJT (E.D. Va.); *In re: U.S. Office of Personnel Management Data Security Breach*

*Litigation*, 1:15-mc-01394-ABJ (D.C.); *Torres v. Wendy's International, LLC*, No. 6:16-cv-210 (M.D. Fla.); *In Re: Equifax, Inc. Customer Data Security Breach Litigation*, 1:17-md-2800-TWT (N.D. Ga.); *In re The Home Depot, Inc. Customer Data Security Data Breach Litigation*, No. 1:14-md-02583-TWT (N.D. Ga.); *In re Yahoo! Inc. Customer Data Sec. Breach Litig.*, 16-md-02752-LHK (N.D. Cal.); and *Finerman v. Marriott Ownership Resorts, Inc.*, Case No.: 3:14-cv-1154-J-32MCR (M.D. Fla.).

Patrick has deep substantive experience in data breach cases. He has deposed multiple C-suite-level executives, prepared and examined expert witnesses, as well as briefed and argued motions for class certification and summary judgment in any number of data breach cases. For example, in *In re: Yahoo! Inc. Customer Data Security Breach Litigation*, Case No. 16-md-2752, (N.D. Cal.), a data breach class action involving approximately 3 billion Yahoo user accounts, Patrick was deeply involved in discovery, including with the depositions of multiple Chief Information Security Officers ("CISO") and other cybersecurity related witness, including the Chief Information Officer ("CIO"); as well as assisting with the reports, and defending the depositions, of Plaintiffs' cybersecurity and identity theft experts. Likewise, in the *In re Capital One Customer Data Security Breach Litigation*, Case No.: 1:19-md-2915 (E.D. Va.) case, Patrick was heavily involved in all aspects of discovery including drafting and arguing myriad motions to compel and the taking of various depositions, including multiple corporate representative witnesses for both Capital One and Amazon Web Services, as well as arguing and briefing summary judgment and class certification.

Patrick has been appointed as Co-Lead Counsel in multiple pending data breach class actions, including *Hernandez et al. v. Advance America, Cash Advance Centers, Inc. et al*, Case No. 7:23-cv-4256 (D. S.C.), and *In re Great Expressions Data Security Incident Litigation*, Case No. 2:23-cv-11185 (E.D. Mich.).

Apart from data privacy cases, Patrick has been appointed as Class Counsel in other consumer class action cases, including in *Swaney v. Regions*, Case No. 2:13-cv-00544-JHE (N.D. Ala.) (TCPA class action, Final Approval entered), *Peterson v. Apria Healthcare Group, Inc.*, Case No. 6:19-cv-00856 (M.D. Fla.) (TCPA class action, Final Approval entered), and *Guidry v. Penn Credit*, Case No.: 6:19-cv-1936-Orl41LRH (M.D. Fla.) (TCPA class action, Final Approval entered); and in *Richards et al. v. Chime Financial, Inc., et al.*, Case No. 4:19-cv-06864 (N.D. Cal.), a case involving a payment disruption for certain payment card users.

Patrick is also no stranger to contested class certifications, having certified nationwide and multi-state classes in cases such as *Still v. Selene Finance, LP*, Case No. CJ-2013-51 (Okla. Dist. Ct, Nowata County) (multi-state certified class action concerning property inspections fees related to HUD-backed mortgages); and *Nolen et al. v. Fairshare Vacation Owners Association*, Case No.

6:20-cv-330-PGB-EJK (M.D. Fla.) (nationwide class certified concerning alleged breaches of fiduciary duties involving a Wyndham timeshare program).

Patrick was selected as a Florida Super Lawyer Rising Star in 2019, 2020, and 2021 in the field of Class Actions. He is also active in speaking on privacy and class action topics, having spoken in June 2018, October 2022, and March 2023 at the NetDiligence Cyber Risk Summit on various privacy related topics; in November 2018 at the American Association for Justice's Advanced 30(b)(6) Seminar, on the topic of 30(b)(6) Depositions in Data Breach Cases; in January 2019 at HarrisMartin's Marriott Data Breach Litigation Conference on the topic of damage models and settlements in data breach cases; and in October 2019 at the Mass Torts Made Perfect conference on Rule 23(c)(4) classes.

Mr. Barthle was admitted to the Florida Bar in 2012 and is also admitted to practice in the Middle District of Florida, the Southern District of Florida, the District of Colorado, the Northern District of Illinois, the Eastern District of Michigan, the Northern District of Oklahoma, the Southern District of Texas, and the Eleventh Circuit Court of Appeals.

***Ron Podolny.*** Ron Podolny joined our Complex Litigation Group after practicing for 15 years in Canada, 10 of which were dedicated exclusively to representing the plaintiffs in class actions and mass torts. At Morgan & Morgan, his practice is focused on representing the plaintiffs in class actions arising out of data breaches, misleading advertising, defective consumer and pharmaceutical products and other matters.

Ron has served as an adjunct professor at the University of Toronto, Faculty of Law and Osgoode Hall Law School, York University. He speaks frequently in professional conferences on matters relating to class actions and commercial litigation. In particular, Ron has presented repeatedly on cross-border class actions at the American Association for Justice conferences, across the U.S.

Ron has authored articles on a variety of topics in class actions and commercial litigation in leading industry and academic publications. His articles have been cited with approval by the courts, including the Supreme Court of Canada. He has been interviewed on legal matters in television, radio and print media.

In 2018, Ron was the recipient of the Precedent Setter Award, which recognizes lawyers called to the bar in the last 10 years who have shown excellence and leadership in their practice and their community.



In 2019, Ron was the recipient of the “Lexpert Rising Stars Award: Leading Lawyers Under 40.”

In 2022, Ron was awarded the Osgoode Hall Law School Faculty Teaching and Service Award for his contribution to legal education as an Adjunct Professor.

In 2023, Ron was recognized by Best Lawyers™ in the category of Securities Law. This prestigious recognition is awarded on the basis of an exhaustive evaluation process of lawyers’ professional expertise, in the form of a national peer-review survey.

In 2024, Ron was recognized as Repeatedly Recommended (Class Actions) in the Canadian Legal Lexpert Directory.

Ron is called to the bars of New York and Ontario, and practices in the Tampa office.

**Francesca Kester Burne.** Ms. Burne was born and raised in Scranton, Pennsylvania. She attended The Pennsylvania State University’s Dickinson School of Law, where she received her Juris Doctor degree in 2017. While at Dickinson, Ms. Burne competed in the American Bar Association’s National Appellate Advocacy Competition, where she was awarded the highest honor for her legal brief writing, and the Texas Young Lawyer’s National Trial Competition, where she finished as a regional finalist. Ms. Burne also served as Executive Chair of the Dickinson Law Moot Court Board, Founder of the Dickinson Law partnership with Big Brothers Big Sisters, and Student Director of the Bethesda Mission Men’s Shelter legal clinic.

Ms. Burne completed an externship with United States Magistrate Judge Martin C. Carlson while in law school. After graduation, she served for two years as a law clerk to the Honorable James M. Munley in the United States District Court for the Middle District of Pennsylvania. Ms. Burne now focuses her class action practice on complex litigation, including consumer protection, data privacy, and defective products class actions.

She has been honored with the D. Arthur Magaziner Human Services Award for outstanding academic achievement and service to others and the Pennsylvania Bar Association’s Joseph T. McDonald Memorial Award for excellence in trial advocacy.

Ms. Burne is admitted to practice law in both Pennsylvania and Florida as well as various federal courts throughout the country, to include the Southern District of Florida.

**Ross Berlin.** Ross Berlin is a member of the Complex Litigation Group. Mr. Berlin earned his law degree with honors from the Northwestern University Pritzker School of Law. After law

school, Mr. Berlin completed two judicial clerkships, first for the Honorable Kevin G. Ross of the Minnesota Court of Appeals and then for Judge Paul C. Huck of the United States District Court for the Southern District of Florida. Following his clerkships, Mr. Berlin returned to his hometown of West Palm Beach, Florida, to continue his public service as an appellate public defender, where he represented indigent defendants on appeal from their criminal convictions. Mr. Berlin's appellate-litigation and clerkship experience attracted one of the largest law firms in the world, and Mr. Berlin entered private practice. In that role, Mr. Berlin represented multi-billion-dollar corporations in both trial and appellate-level litigation in federal and state courts in high-stakes matters spanning the entire United States and the world. Mr. Berlin's passion for protecting the most vulnerable in society led him to join Morgan & Morgan's Complex Litigation team, where he now represents the people in litigation against the world's most powerful corporations.

***Antonio Arzola, Jr.*** Mr. Arzola was born and raised in Miami, Florida to first-generation Cuban-American parents. In 2018, Antonio obtained a Bachelor of Science degree in Criminal Justice from Florida International University. After graduating, Antonio worked as a North American Language and Culture Assistant in a primary school in Barxeta, Spain, where he taught English to primary school Spaniard students for a year. During his teaching assistantship, Antonio obtained a Bachelor of Arts degree in Portuguese from Florida International University in 2019. In 2022, he obtained his Juris Doctor degree, *cum laude*, from Florida International University. While at Florida International University College of Law, he received the “Book Award” for achieving the highest grade in his Legal Writing III course. Also, he represented Florida International University in the 2022 Moot Madrid International Arbitration Competition, where he conducted oral arguments in Spanish in mock arbitration proceedings in Madrid, Spain. Before joining Morgan & Morgan, Antonio served as a judicial law clerk to the Honorable Federico A. Moreno, United States District Judge, Southern District of Florida. Antonio is fluent in English, Spanish, and Portuguese and is an avid runner. Antonio was admitted to the Florida Bar in 2022 and is a Certified Information Privacy Professional (United States).

***Riya Sharma.*** Ms. Sharma is a dual-qualified attorney admitted to the Texas Bar and the New Delhi Bar, licensed to practice throughout India. After her Juris Doctor/B.A LL.B. from the Jindal Global Law School, she earned her LL.M. from the University of California, Berkeley, School of Law, where she graduated with High Honors in Information Privacy Law, Legal Research and Writing, Contract Law, Fundamentals of U.S. Law, and Legal Ethics and Compliance. She graduated from Berkeley as the highest performer in Contract Law. At Berkeley, she furthered her commitment to legal advocacy and served as a Pro-Bono Student Advocate with the Workers’ and Tenants’ Rights Clinic and contributed as a member of the Berkely Center for Law and Technology and the Privacy Lab, and also worked towards

advancing the rights of women in Technology Law. Prior to obtaining her Masters in Law, Ms. Sharma worked as a Judicial Law Clerk to Justice Abdul S. Nazeer, a Judge of the Supreme Court of India, handling complex federal matters. Alongside her judicial clerkship, she collaborated with UNICEF to provide e-education to underprivileged children during the COVID-19 pandemic. Fluent in both English and Hindi, Ms. Sharma is also certified by the World Intellectual Property Organization for coursework in U.S Intellectual Property.

***Christopher Pollack.*** Chris Pollack was born and raised in Florida. Mr. Pollack studied finance at the University of Central Florida, and then earned his law degree from the University of Michigan Law School. While in law school, Mr. Pollack worked on the Civil Rights Litigation Clearinghouse, and he earned Certificates of Merit in both Evidence and Jurisdiction & Choice of Law.

Upon graduating, Mr. Pollack spent the first several years of his career as a judicial clerk, first spending 20 months with the Honorable Jeffrey J. Helmick in the U.S. District Court for the Northern District of Ohio, and then a year with the Honorable Robin S. Rosenbaum in the U.S. Court of Appeals for the Eleventh Circuit. Prior to joining Morgan & Morgan's Complex Litigation Group, Mr. Pollack worked for law firms in D.C. and Michigan, representing businesses across the country and gaining experience that he now uses to advocate for consumers in class action litigation.

Mr. Pollack is admitted to practice in Illinois, D.C., and Michigan.

***Abraham Barkhordar, Law Clerk.*** Abraham Barkhordar was born and raised in Los Angeles, California. He attended Santa Monica college where he played on the school water polo team before transferring to UCLA where he was admitted to the Honors Program and graduated, summa cum laude, with a major in History. While at UCLA, Abraham volunteered with Americorps' Justicecorps program and also volunteered at a local immigration law firm.

Thereafter, Mr. Barkhordar attended Harvard Law School where he co-founded and served as innagural co-president of the Harvard Plaintiffs' law association—the first law student organization of its kind in the country. Since graduating from Harvard, Mr. Barkhordar has joined the San Francisco office of Morgan & Morgan's Complex Litigation Group where he focuses on consumer class action litigation.